



Wm. Bolthouse Farms, Inc.  
7200 East Brundage Lane • Bakersfield, CA 93307-3016  
661/366-7205

August 12, 2005  
Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
1400 Independence Ave., SW. Room 4008  
So., Ag Stop 0268  
Washington, DC 20250

Email: [National.List@usda.gov](mailto:National.List@usda.gov)  
Fax (202) 205-7808

**Subject: Docket No. TM-04-07 National Organic Program, Sunset Review.**

Dear Mr. Neal and National Organic Standards Board:

Bolthouse Farms appreciates the opportunity to comment on the review of organic substances listed for organic use. We are a California based Farming Company that grows and processes organic carrots year round. Our organic carrots are sold throughout the United States and Canada. We strongly support the renewal and continued use of the following substances listed below for organic use.

**§205.601 Synthetic substances allowed for use in organic crop production.**

a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems.

(2) Chlorine materials-*Except*, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

- (i) Calcium hypochlorite.
- (ii) Chlorine dioxide.
- (iii) Sodium hypochlorite.

**Vital for cleaning and sanitation.**

**Docket No. TM-04-07 National Organic Program, Sunset Review.****§205.601 Synthetic substances allowed for use in organic crop production.**

<p><b>(a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems.</b></p> <p>(4) Hydrogen peroxide</p> <p>(7) Soap-based algicide/demosers</p>	<b>Vital for cleaning and sanitation.</b>
<p><b>(b) As herbicides, weed barriers, as applicable.</b></p> <p>(1) Herbicides, soap-based – for use in farmstead maintenance (roadways, ditches, right of ways, building perimeters) and ornamental crops.</p> <p>(2) Mulches.</p> <p>(i) Newspaper or other recycled paper – without glossy or colored inks.</p> <p>(ii) Plastic mulch and covers (petroleum – based other than polyvinylchloride (PVC)).</p>	<b>Vital for weed, insect and disease control.</b>
<p><b>(d) As animal repellents—</b>Soaps, ammonium – for use as a large animal repellent only, no contact with soil or edible portion of crop.</p>	<b>Vital for crop protection and sanitation.</b>
<p><b>(e) As insecticides (including acaricides or mite control).</b></p> <p>(1) Ammonium carbonate - for use as bait in insect traps only, no direct contact with crop or soil.</p> <p>(2) Boric acid – structural pest control, no direct contact with organic food or crops.</p> <p>(4) Elemental Sulfur.</p> <p>(5) Lime sulfur- including calcium polysulfide.</p> <p>(6) Oils, horticultural – narrow range oils as dormant, suffocating, and summer oils.</p> <p>(7) Soaps, insecticidal.</p> <p>(8) Sticky traps / barriers.</p>	<b>Essential for pest control and crop protection.</b>

**Docket No. TM-04-07 National Organic Program, Sunset Review.****§205.601 Synthetic substances allowed for use in organic crop production.**

<p><b>(f) As insect management</b> Pheromones.</p>	<p><b>Vital for crop protection.</b></p>
<p><b>(g) As rodenticides.</b> (1) Sulfur dioxide - underground rodent control only (smoke bombs). (2) Vitamin D<sub>3</sub>.</p>	<p><b>Vital for crop protection and sanitation.</b></p>
<p><b>(i) As plant disease control</b> (1) Copper fixed – copper hydroxide, copper oxide, copper oxychloride, includes products exempted from EPA tolerance, <i>Provided</i>, That, copper-based materials must be used in a manner that minimizes accumulation in the soil and shall not be used as herbicides. (2) Copper sulfate- Substance must be used in a manner that minimizes accumulation of copper in soil. (3) Hydrated lime (4) Hydrogen peroxide. (5) Lime sulfur. (6) Oils, horticultural, narrow range oils as dormant, suffocating, and summer oils. (8) Potassium bicarbonate. (9) Elemental sulfur.</p>	<p><b>Essential for disease control and crop protection.</b></p>
<p><b>(j) As plant and soil amendments.</b> (1) Aquatic plant extracts (other than hydrolyzed) – Extraction process is limited to the use of potassium hydroxide or sodium hydroxide; solvent amount used is limited to that amount necessary for extraction. (2) Elemental sulfur. (3) Humic acids - naturally occurring deposits, water and alkali extracts only. (4) Lignin sulfonate – chelating agent, dust suppressant, floatation agent.</p>	<p><b>Vital for essential plant nutrients and plant health.</b></p>

**Docket No. TM-04-07 National Organic Program, Sunset Review.****§205.601 Synthetic substances allowed for use in organic crop production.**

<p><b>(j) As plant and soil amendments.</b>          (5) Magnesium sulfate – allowed with a documented soil deficiency.          (6) Micronutrients - not to be used as a defoliant, herbicide, or desiccant.          (i) Soluble boron products.          (ii) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.          (7) Liquid fish products – can be pH adjusted with sulfuric, citric or phosphoric acid. The amount of acid used shall not exceed the minimum needed to lower the pH to 3.5.          (8) Vitamins, B<sub>1</sub>, C, and E.</p>	<p><b>Vital for essential plant nutrients and plant health.</b></p>
<p><b>(m) As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for the use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.</b>          (1) EPA List 4 – Inerts of Minimal Concern.</p>	<p><b>Essential compounds used in pesticides for plant pest and disease control.</b></p>

**§205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food groups(s)).”**

<p><b>(b) Synthetics allowed.</b>          Chlorine materials – disinfecting and sanitizing food contact surfaces, <i>Except</i>, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and sodium hypochlorite). active pesticide ingredient in accordance with any limitations on the use of such substances.</p>	<p><b>Essential for disinfecting, food sanitation and food safety.</b></p>
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**§205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."**

<b>(b) Synthetics allowed.</b> Hydrogen peroxide Ozone Phosphoric acid – cleaning of food - contact surfaces and equipment only.	<b>Essential for disinfecting, food sanitation and food safety.</b>
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The materials listed above are necessary for us to provide high quality organic carrots. We also know that for the continued success of the "Organic Industry" into the mainstream food market these materials are essential for our fellow growers and processors. The "Organic Industry" continues to grow with new products and greater supply each year, because of the National Organic Program (NOP) standardization. The NOP has developed a strong foundation to ensure consumer confidence within the "Organic Industry". We strongly encourage you to reinstate the use of the above listed substances. This will ensure continued growth, reliability and safety of organic food.

Respectfully submitted,



Malcolm Ricci  
Organic Operations Coordinator